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12 **ATTORNEYS FOR NHENTAI.NET**

13
14 UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

15 PCR DISTRIBUTING CO., a company
16 organized under the laws of California,

Case No. 2:24-mc-07453-CV-AJR

17 *Plaintiff*
18 vs.

19 JOHN DOES 1-20 d/b/a
20 NHENTAI.NET,

**DECLARATION OF JENNIFER M.
RYNELL IN SUPPORT OF
NHENTAI.NET'S MOTION TO
DISMISS (FED. R. CIV. P. 12(b)(6))
AND STRIKE (FED. R. CIV. P.
12(f))**

21 *Defendants*

22 Date: TBD
Place: First Street Courthouse
350 W. 1st Street, Courtroom 5D
5th Floor
23 Los Angeles, California 90012
24 Honorable Judge Cynthia Valenzuela
25
26
27

1 I, Jennifer M. Rynell, hereby state and declare as follows:

2 1. I am a partner in the law firm of Wilson Whitaker Rynell in Dallas,
3 Texas and one of the attorneys for Nhentai.net admitted *pro hac vice* in the above-
4 referenced matter. I have personal knowledge of the facts stated herein.

5 2. I provide this declaration in support of Nhentai.net's ("Nhentai.net")
6 Motions to Dismiss and/or Strike ("Motions").

7 3. Attached as **Exhibit A** is a true and correct copy of the Certificate of
8 Registration received from the U.S. Copyright Office for Copyright No. TX9-380-
9 863.

10 4. Attached as **Exhibit B** is a true and correct copy of the Certificate of
11 Registration received from the U.S. Copyright Office for Copyright No. TX9-312-
12 666.

13 5. Attached as **Exhibit C** is a true and correct copy of the Certificate of
14 Registration received from the U.S. Copyright Office for Copyright No. TXu2-409-
15 564.

16 6. Attached as **Exhibit D** is a true and correct copy of the Certificate of
17 Registration received from the U.S. Copyright Office for Copyright No. TXu2-417-
18 803.

19 7. Attached as **Exhibit E** is a true and correct copy of the Certificate of
20 Registration received from the U.S. Copyright Office for Copyright No. TXu2-390-
21 196.

22 8. Attached as **Exhibit F** is a true and correct copy of the Copyright Office
23 catalog printout for Copyright No. TXu002391218.

24 9. Attached as **Exhibit G** is a true and correct copy of the Copyright
25 Office catalog printout for Copyright No. TXu002435667.

26 10. As shown in **Exhibits A-G**, the Copyright Office Certificates of
27 Registration and catalog printouts do not indicate that any of the alleged copyrighted

1 material is in the form of videos or images.

2 11. I last visited <https://nhentai.net/g/312283/> on February 6, 2025. On that
3 date, this website indicated that the first page of the book “Submission Eternal My
4 Lady, My Master,” was uploaded four years and nine months ago, i.e., in mid-2020.

5 12. I last visited <https://nhentai.net/g/208694/> on February 6, 2025. On that
6 date, this website indicated that the first page of the book “Hey...Let’s Do It,” was
7 uploaded seven years and four months ago, i.e., in the fall of 2017.

8 13. I last visited <https://nhentai.net/g/543331/> on February 4, 2025. This
9 URL does not actually link to any material that appears to be called or relate to
10 “Sexual Healing.”

11 14. I last visited <https://nhentai.net/g/340116/> on February 4, 2025. This
12 URL appears to link to a work that has a Japanese title that was uploaded four years
13 and one month ago.

14 15. Nhentai.net obtained the deposit material from the U.S. Copyright
15 Office relating to four of the five copyrights originally asserted by Plaintiff. The
16 page shown in the Motions is a true and correct copy of a page from the book “Hey
17 ... Let’s Do It,” which is the subject of Copyright Registration No. TX9-380-863.
18 Nhentai.net obtained the page shown from that deposit material and it is included in
19 its entirety in Nhentai’s Motions – including the images.

20 16. The page shown in the Motions from the book “Hey ... Let’s Do It”
21 that is the subject of Copyright Registration No. TX9-380-863 includes selected
22 phrases such as “That’s her...” and “She’s chubby, but she’s mine.”

23 17. The deposit material from the U.S. Copyright Office for the book “Hey
24 ... Let’s Do It” (Copyright Registration No. TX9-380-863) includes many other
25 words and short phrases such as “shlurp,” “plap,” “I need it,” “Take it,” “Open
26 wide,” “Yesss,” “More,” “Yo! Special delivery,” “Now put it in your mouth,” and
27 “What’s the blindfold for?”

1 18. Nhentai.net obtained correspondence between Plaintiff and/or JAST
2 USA with the Copyright Office relating to the five copyrights originally asserted by
3 Plaintiff. Attached as **Exhibit H** hereto is a true and correct “Copy of
4 Correspondence” received from the U.S. Copyright Office for Copyright TX9-380-
5 863 –“Hey ... Let's Do It!”

6 19. Attached as **Exhibit I** hereto is a true and correct "Copy of
7 Correspondence" received from the U.S. Copyright Office for Copyright TX9-312-
8 666 – "Submission Eternal My Lady, My Master."

9 20. Nhentai.net's counsel, including me, conducted searches in the San
10 Diego County fictitious business entity records by the filing number Plaintiff
11 provided in its First Amended Complaint and by all variations of the entity names
12 involved and were unable to locate the alleged filing.

I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on February 10, 2025 in Dallas, Texas.


Jennifer M. Rynell

CERTIFICATE OF SERVICE

19 On February 10, 2025, I filed the foregoing document with the clerk of court
20 for the U.S. District Court, Central District of California via CM/ECF. I hereby
21 certify that I thereby have served the document on all counsel and/or pro se parties
22 of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and
23 the Local Rules.


Jennifer M. Rynell